



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

DEC 18 2015

OFFICE OF
WATER AND
WATERSHEDS

Reply to Attn of: OWW-191

Agrium Conda Phosphate Operations
Attn: Justin Skinner
3010 Conda Road
Soda Springs, ID 83276

Re: Additional Monitoring Requirements for the Rasmussen Ridge Mine under the National Pollutant Discharge Elimination System Multi-Sector General Permit, Permit Reference No. IDR053131

Dear Mr. Skinner:

The purpose of this letter is to notify you of watershed specific monitoring requirements that must be implemented at your facility to maintain permit coverage under the U.S. Environmental Protection Agency's 2015 Multi-Sector General Permit for Storm water Discharges Associated with Industrial Activity (MSGP). Based on the information provided in your Notice of Intent (NOI), storm water from the Rasmussen Ridge Mine at 3826 Blackfoot River Road in Soda Springs, Idaho (Facility) discharges into Rasmussen Creek, Sheep Creek, and Angus Creek. The State of Idaho Department of Environmental Quality (IDEQ) has established Total Maximum Daily Loads (TMDLs) for sediment for Angus and Sheep Creeks.

Basis for EPA to Add Additional Requirements

Part 2.2.2.1 of the MSGP, Existing Discharge to an Impaired Water with an EPA Approved or Established TMDL, states, "If you discharge to an impaired water with an EPA-approved or established TMDL, EPA will inform you whether any additional measures are necessary for your discharge to be consistent with the assumptions and requirements of the applicable TMDL and its wasteload allocation, or if coverage under an individual permit is necessary per Part 1.2.3." See also Part 6.2.5 of the MSGP (allowing EPA to notify a facility of additional monitoring requirements).

Specific Requirements

Pursuant to Parts 2.2.2.1 and 6.2.4.1 of the MSGP, the Facility is required to conduct storm water monitoring for TSS at discharges to Angus and Sheep Creeks following the standard benchmark monitoring procedures outlined in the MSGP at Part 6.2.1. This is in addition to the monitoring for TSS at the discharges to Rasmussen Creek as per Part 6.2.4 of the MSGP.

Because turbidity is typically easier to monitor, and a relationship between turbidity and TSS can be established, we are requiring turbidity monitoring; if you find that it would be preferable to do TSS, please let us know.

Turbidity is to be measured:

1. immediately upstream from the discharge point and outside any visible plume; and

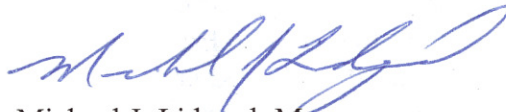
2. immediately downstream from the discharge point and within any visible plume. While this sampling is to be done in the framework of benchmark monitoring to determine whether the facility is contributing to the impairment, your results are to be compared to the Idaho Water Quality Standards for turbidity. Turbidity is allowed up to 50 NTUs above the background measurement instantaneously or up to 25 NTUs above background measurement for more than 10 days. Any single sampling event that exceeds the 50 NTU standard, or any series of samples indicating an exceedance of the 25 NTU standard, constitutes a violation of the permit triggering the need for corrective actions.

Monitoring data and corrective action reports shall be submitted to EPA and IDEQ in accordance with Part 7 of the MSGP. Use EPA's electronic data system to submit to EPA. For IDEQ, please submit to the Pocatello Regional Office:

Lynn Van Every
DEQ Pocatello Regional Office
444 Hospital Way #300
Pocatello, ID 83201
(208) 236-6160
lynn.vanevery@deq.idaho.gov

If you have any questions, please contact Margaret McCauley of my staff at mccauley.margaret@epa.gov or (206) 553-1772.

Sincerely,



Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Lynn Van Every, Idaho Department of Environmental Quality